

WATER QUALITY M E M O R A N D U M

Utah Coal Regulatory Program

January 28, 2004

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: Steve Fluke, Reclamation Hydrogeologist

RE: 2003, First Quarter Water Monitoring, Genwal Resources, Inc.,
Crandall Canyon Mine, C/015/0032-WQ03-1, Task ID #1861

1. Was data submitted for all of the MRP required sites? YES [] NO [X]

No access reported for eleven of fourteen spring monitoring sites. Missing reports for spring SP-30, well DH-1, and stream Indian Creek.

2. On what date does the MRP require a five-year resampling of baseline water data.

Resampling due date.

Analyses for parameters on the “extended” parameter lists (baseline) in the MRP were performed in 1990, 1995, 2000 and are to be done thereafter at five-year intervals – during low-flow (fourth quarter) – until surety bond is released: the next baseline analyses will be done in 2005.

3. Were all required parameters reported for each site? YES [X] NO []

4. Were irregularities found in the data? YES [] NO [X]

5. Were DMR forms submitted for all required sites?

1st month, YES [X] NO []
2nd month, YES [X] NO []
3rd month, YES [X] NO []

DMR data is submitted to the DOGM database. No flow was reported for UPDES site 001 (discharge from the sediment pond to Crandall Creek).

6. Were all required DMR parameters reported? YES [] NO [X]

Missing January and February oil and grease data for UPDES site 002.

7. Were irregularities found in the DMR data? YES [X] NO []

UPDES site 002 reported dissolved oxygen of 2.2 mg/L for March, below the 30-day average of 3 mg/L.

8. Based on your review, what further actions, if any, do you recommend?

Determine why no reports were submitted for SP-30, DH-1, and Indian Creek. Indian Creek is not accessible in the spring due to a closed gate and well DH-1 has been reported dry since 1991. SP-30 has not indicated change in flows or diminished water quality. Well DH-1 has been reported as dry since 1991. It is unlikely that the missing reports will be of any consequence as long as the mine does not miss submittals for these sites in the future.

Gary Gray was not aware that the UPDES sites are to be analyzed for oil and grease on a monthly basis as stated in their permit. He has been analyzing for oil and grease on a quarterly basis or if a sheen is observed as specified in their original permit. Gary will begin analyzing for oil and grease on a monthly basis now that he is aware of the omission. Oil and grease concentrations have not exceeded the discharge limitation of 10 mg/L at this outfall in the past.

Dissolved oxygen has not been reported below the 30-day average of 3 mg/L in previous sampling of UPDES site 002. Make sure that the operator has informed the Utah DWQ of the Dissolved oxygen has not been reported below the 30-day average of 3 mg/L in previous sampling of UPDES site 002.